

STATE OF WASHINGTON  
GAMBLING COMMISSION

In the Matter of the Revocation of the	)	
License to Conduct Gambling Activities of:	)	NO. CR 2008-01475
	)	
Shanelle Sodimu,	)	<b>FINDINGS, CONCLUSIONS,</b>
Seattle, Washington,	)	<b>DECISION, AND FINAL</b>
	)	<b>ORDER IN DEFAULT</b>
Licensee.	)	

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THE MATTER of the revocation of the license to conduct gambling activities of Shanelle Sodimu having come before the Commission on May 14, 2009, the State being represented by Jerry Ackerman, Senior Counsel, Office of the Attorney General, the Commission makes the following Findings of Fact, Conclusions of Law, and issues the following Decision and Order:

**FINDINGS OF FACT**

I.

The Washington State Gambling Commission issued Shanelle Sodimu the following license:

Number 68-26715 Authorizing House-Banked Card Room Employee Activity, formerly at Silver Dollar Casino in Sea-Tac.

The license expires on July 6, 2009, and was issued subject to the licensee's compliance with state gambling laws and Commission rules.

II.

On March 25, 2009, Director Rick Day issued administrative charges to the licensee, by certified and regular mail. The licensee did not respond to the charges. By not responding to the charges, Shanelle Sodimu waived her right to a hearing on such charges and pursuant to RCW 34.05.440, this final order may be entered in default.

III.

1) On or about September 4, 2008, a Commission Special Agent (agent) began an investigation into a surveillance violation, by the licensee, Shanelle Sodimu.

2) The agent began his investigation after Khristie Aman, General Manager of the Sea-Tac Silver Dollar Casino, told the agent that Ms. Sodimu had been observed admitting her unlicensed boyfriend into the surveillance room. The casino's internal controls required that no unauthorized persons be permitted to access the surveillance room, and that security officers log in and log out each time they entered or exited the room. Ms. Aman informed the agent that at the Silver Dollar Casino, it is the normal course of business for surveillance observers to routinely check the surveillance of other observers.

- 3) Ms. Aman also informed the agent that she planned to terminate Ms. Sodimu on September 4, 2008, and that she planned to have the King County Sheriff Deputy on-site issue a Trespass Warning Letter to Ms. Sodimu.
- 4) The agent was provided five DVD recordings, copies of three incident reports, and a copy of the Trespass Warning letter.
- 5) The agent reviewed surveillance video of the surveillance room door, and from the surveillance room itself from September 1, 2008, at approximately 22:19 hours, through September 2, 2008, at 05:04 hours. The agent saw the following:
  - a. On September 1, 2008, at approximately 22:19 hours, the licensee and Javonne Hall, who is unlicensed, enter the surveillance room through an exterior exit door in the back of the kitchen adjacent to a restricted area.
  - b. During the time Mr. Hall was in the surveillance room, the licensee leaves Mr. Hall unattended approximately seven times. The licensee fails to record her entries and exits in the sign in log.
  - c. On two occasions, other Silver Dollar employees enter the surveillance room. During these occasions, Mr. Hall hides in the adjacent bathroom to avoid being seen.
  - d. On September 2, 2008, at 05:04 hours, the licensee and Mr. Hall exit the surveillance room together through the east door.
- 6) The agent reviewed the sign in log, which does not show the licensee's multiple entries and exits of the surveillance room and which also failed to mention the admission of Mr. Hall to the room.
- 7) On September 4, 2008, Ms. Aman met with the licensee at the casino entrance and notified her that she was terminated. The licensee was also served with a Trespass Warning Letter.
- 8) On September 22, 2008, the agent telephoned the licensee and asked if she wanted to give a voluntary statement at the Commission's Tacoma office. They agreed on a date and time of September 23, 2008, at 14:00 hours. On September 23, 2008, at the appointed time, the licensee neither appeared nor called to explain her absence.

#### **VIOLATIONS:**

- 1) RCW 9.46.075(1) provides that the Commission may revoke a license if the licensee has violated the provisions, requirements or duties imposed by chapter 9.46 RCW or any rule adopted by the Commission.
- 2) WAC 230-03-085(1) provide that the Commission may revoke a license when the holder, or any other person with any interest in the holder commits any act that constitutes grounds under RCW 9.46.075 for suspending licenses, or commits any other act that the Commission determines constitutes a sufficient reason in the public interest for suspending licenses or permits.
- 3) WAC 230-15-425(2) requires licensed card room employees to follow the internal control procedures for their individual functions.

4) WAC 230-03-085(8) provides that the Commission may revoke a license when the licensee poses a threat to the effective regulation of gambling or creates or increases the likelihood of unfair or illegal practices, methods, and activities in the conduct of gambling activities, as demonstrated through the person's prior activities, criminal record, reputation, habits, or associations.

On September 1, 2008, and September 2, 2008, the license admitted an unlicensed individual into a controlled area. In an effort to hide her actions, she misrepresented her entry and exits in the sign in log. By her behavior, Ms. Sodimu increased the likelihood of unfair or illegal practices in the conduct of gambling activities. The licensee violated Silver Dollar Casino's internal controls, in violation of WAC 230-15-425. Without management's authorization, the licensee gave Mr. Hall access to sensitive areas. She also failed to log in and out of the surveillance room as required. Therefore, grounds exist to revoke Shanelle Sodimu's license pursuant to RCW 9.46.075 and WAC 230-03-085.

5) RCW 9.46.075(2) provides that the Commission may deny an application, or suspend or revoke any license or permit issued by it, for any reason or reasons, it deems to be in the public interest. These reasons shall include, but not be limited to, cases wherein the applicant or licensee, or any person with any interest therein: (2) Knowingly causes, aids, abets, or conspires with another to cause, any person to violate any of the laws of this state or the rules of the Commission.

6) RCW 9.46.185 provides that any person who knowingly causes, aids, abets, or conspires with another to cause any person to violate any rule or regulation adopted pursuant to RCW 9.46. shall be guilty of a gross misdemeanor.

7) RCW 9.46.075(8) provides that the Commission may revoke a license when a licensee fails to prove, by clear and convincing evidence, that he is qualified in accordance with the provisions of this chapter.

8) RCW 9.46.153(1) provides that it shall be the affirmative responsibility of each licensee to establish by clear and convincing evidence the necessary qualification for licensure of each person required to be qualified under the law.

Ms. Sodimu has failed to prove that she is qualified to be licensed, in violation of RCW 9.46.153. She permitted an unlicensed person into the surveillance room, and conspired with another to violate Casino internal controls, in violation of RCW 9.46.185. She also failed to sign in and out of the surveillance room, in violation of Casino internal controls. Therefore, grounds exist to revoke her license pursuant to RCW 9.46.075 and WAC 230-03-185.

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IV.

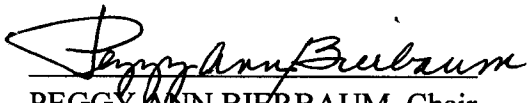
**CONCLUSIONS OF LAW**

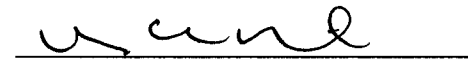
The circumstances specified in the Findings of Facts in section III above constitute grounds for the revocation of Shanelle Sodimu's license to conduct gambling activities under the authority of RCW 9.46.075 and WAC 230-03-085.


**DECISION AND ORDER**

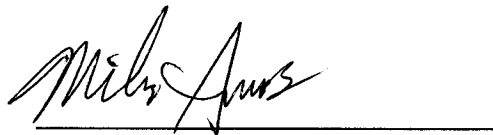
The Washington State Gambling Commission HEREBY ORDERS: Shanelle Sodimu's license to conduct card room employee activities is REVOKED.

DATED this 14<sup>th</sup> day of May, 2009.

  
PEGGY ANN BIERBAUM, Chair

  
KEVEN ROJECKI, Vice Chair

  
JOHN ELLIS

  
MIKE AMOS

**NOTICE:** RCW 34.05.440(3) provides that within seven (7) days after service of a default order the party against whom it was entered may file a written motion requesting that the order be vacated and stating the grounds relied upon.

Motions must be mailed to:

Washington State Gambling Commission  
Communications & Legal Division  
PO Box 42400  
Olympia, Washington 98504-2400

Or delivered in person or via private courier:

Washington State Gambling Commission  
Communications and Legal Division  
4565 7<sup>th</sup> Avenue SE  
Lacey, Washington 98503